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**From:** McKim, Krista [mckim.krista@epa.gov]  
**Sent:** 5/17/2018 1:35:09 PM  
**To:** Burdick, Melanie [Burdick.Melanie@epa.gov]; Ackerman, Mark [ackerman.mark@epa.gov]; Compton, Mark [compton.mark@epa.gov]  
**Subject:** MPCA's memo review of Polymet's deposition/downstream impacts paper  
**Attachments:** wq-wwprm1-51h.pdf

In the attached memo, MPCA staff Bruce Monson, their mercury expert recommends that methylmercury monitoring as well as two years of baseline monitoring be added to the requirements for the project. He specifically recommends that the methylmercury monitoring go into the NPDES permit. I don't see the requirements in the draft NPDES permit.... Are there requirements in any of the 404/401 materials that you know of?

Here is the quote, from pdf page 13:

MPCA has made the best estimate of potential effects that we can reach using the best available data and MPCA's best professional judgment. Given the complexity and uncertainty of the biogeochemical processes governing the transport, methylation, and bioavailability of mercury in any particular water body, it is necessary to monitor water quality to confirm the expected outcomes. To this end, I recommend adding methylmercury, along with total mercury, to the stream water quality monitoring specified in the NPDES/SDS permit. In addition, I recommend establishing a baseline set of data in the wetlands surrounding the plat and mine site by monitoring water quality at least monthly, May through October, for two years before project operation. This baseline monitoring should occur at a subset of the wetland hydrology monitoring locations described in Monitoring Plan for Potential Indirect Wetland Impacts...